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7 Attorney for Cipriano Sosa-Perez

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CIPRIANO SOSA-PEREZ,

15 Defendant.

Case No. 2:20-mj-00487-NJK

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Fourth Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Jared Grimmer, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Kathryn C. Newman, Assistant Federal Public Defender, counsel for Cipriano Sosa-Perez,
21 that the Preliminary Hearing currently scheduled on January 8, 2021, be vacated and continued
22 to a date and time convenient to the Court, but no sooner than February 3, 2021.

23 This Stipulation is entered into for the following reasons:

24 1. Defendant Cipriano Sosa-Perez's has entered plea agreement with the
25 government. *United States v. Sosa-Perez*, 2:20-cr-220-KJD-BNW. The parties submitted the
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1 signed plea agreement to the clerk of courts on August 29, 2020. The change of plea is
2 currently set for February 2, 2021.

3 3. Defendant is incarcerated and does not object to a continuance.

4 4. Additionally, denial of this request for continuance could result in a
5 miscarriage of justice and a waste of judicial resources.

6 This is the fourth request for continuance filed herein.

7 DATED this 5th day of January, 2021.

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9 RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

10
11 */s/ Kathryn C. Newman*
By _____

12 KATHRYN C. NEWMAN
13 Assistant Federal Public Defender

/s/ Jared Grimmer
By _____

JARED GRIMMER
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CIPRIANO SOSA-PEREZ,

7 Defendant.

Case No. 2:20-mj-00487-NJK

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 January 8, 2021 at the hour of 4:00 p.m., be vacated and continued to February 9, 2021, at
13 4:00 p.m., in Courtroom 3C.

14 DATED this 5th day of January, 2021.

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17 UNITED STATES MAGISTRATE JUDGE
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